IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS MCALLEN DIVISION

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§	CASE NO.	7:19-CV-405
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UNITED STATES OF AMERICA'S STATUS REPORT

In response to the District Court Order dated February 18, 2020¹, the United States of America hereby informs the Court as follows:

- In its February 11, 2020 Status Report, the United States apprised the Court that the tenant, Marvin Fuller, agreed to sign a disclaimer upon modifying his lease with Gerardo Martinez to accurately reflect the cropland that was lost as a result of the taking.²
- 2. On February 20, 2020, undersigned counsel and a representative from the United States Army Corps of Engineers met with Marvin Fuller to ascertain the status of his negotiations with Gerardo Martinez. During the meeting, Mr. Fuller informed undersigned counsel that he worked out a lease modification with Mr. Martinez, but stated that he wanted to be compensated for the amount of money (\$3,500) he had already put into the lost acreage of tillable cropland at the time of the taking.

¹ Dkt. No. 16.

² Dkt. No. 15.

- 3. The United States has agreed to deposit an additional \$3,500.00 as estimated just compensation into the Registry of the Court in order to compensate Mr. Fuller.
- 4. Undersigned counsel has circulated a draft "Joint Motion for Order Establishing Just Compensation, Granting Possession, and Distributing Funds on Deposit in the Registry of the Court for Tract RGV-WSL-8002" to Marvin Fuller and counsel for Gerardo Martinez and expect to file it within the timeframe pronounced in the Court's February 18, 2020 Order.

Respectfully submitted,

RYAN K. PATRICK

United States Attorney Southern District of Texas

By: s/ N. Joseph Unruh

N. JOSEPH UNRUH

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CERTIFICATE OF SERVICE

I, N. Joseph Unruh, Assistant United States Attorney for the Southern District of Texas, do hereby certify that on this 26th day of February, 2020, a copy of the foregoing was served on the following parties in accordance with the Federal Rules of Civil Procedure.

Roy R. Brandys
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Austin, TX 78701
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Mr. Marvin Fuller

Weslaco, TX 78596

By: s/ N. Joseph Unruh

N. JOSEPH UNRUH

Assistant United States Attorney